

EXHIBIT 19

San Juan, Puerto Rico
July 12, 2021

To: Court Clerk's Office
United States District Court
Room 150 Federal Building
San Juan (Puerto Rico) 00918-1767

From: Ivette González De León
Calle Pellín Rodríguez 372
Villa Palmeras Santurce, PR 00915
Tel: 1-321-557-5127
Case #12526
SS: 5148

Dear official:

I wish that this honorable court reconsider my salary adjustment claim and not dismiss it as per the judgment. I have been waiting for 10 years for what I am owed. Also, I appealed to the Department of Family Affairs for a salary readjustment, merit increases, etc.

For this reason, I request to continue the case under the Promesa Act and that my claim be considered and reevaluated, [marked as] secured, and not dismissed, so that I can be paid what I am owed for these years, given that my colleagues have been paid in full for the legal action and their readjustment.

I attach evidence and please reconsider my claims, [mark it] secured, and not dismiss it. I trust in you and that justice will be served with my Request.

Thank you in advance.

[Signature]
Ivette González De León

[Seal:] RECEIVED AND FILED
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U.S. DISTRICT COURT
SAN JUAN, PR

2021 JUL 22 PM 4:17

Case:17-03283-LTS Doc#:17105-2 Filed:06/18/21 Entered:06/18/21 18:59:34 Desc:

Exhibit A Page 10 of 27

Three Hundred and Forty-First Omnibus Objection

Exhibit A: Claims to be dismissed

CLAIMS TO BE DISMISSED

REMAINING CLAIM

	FILING NAME	CASE/DEBTOR DATE	CLAIM NUMBER	AMOUNT OF No. CLAIM	FILING NAME	CASE/DEBTOR DATE	CLAIM NUMBER	AMOUNT OF No. CLAIM
36	GERMAN TORRES BERRIOS, DBA GERMAN TORRES BERRIOS & ASSOC. HC-4 BOX 5775 BARRANQUITAS, PR 00794-9800	06/04/20 19-BK-05523-LTS / The Puerto Rico Public Buildings Authority	174089	\$3,900.00	GERMAN TORRES BERRIOS & ASSOCIADOS HC 04 BOX 5775 BARRANQUITAS, PR 00794-9609	06/07/18 17 BK 03283-LTS/ The Commonwealth of Puerto Rico	48747	\$15,178.00

Reason: Claim for a duplicate debt, filed against the Puerto Rico Buildings Authority (Debtor) All the invoked liabilities, if any, would be between the Claimant and the Commonwealth of Puerto Rico.

37	GONZALEZ BENITEZ, ROSA M. T-706 CALLE PASIONARIA URB. LOIZA VALLEY CONDUANAS, PR 00729	05/31/18 17 BK 03566-LTS / Puerto Rico Government Employees' Retirement System	47287	\$48,000.00	GONZALEZ BENITEZ, ROSA M T 706 CALLE PASIONARIA CANOVANAS, PR 00729	05/31/18 17 BK 03283-LTS / The Commonwealth of Puerto Rico	90365^	\$48,000.00*
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Reason: Claim of duplicate debt, filed against the Puerto Rico Government Employees' Retirement System. All the invoked liabilities, if any, would be between the Claimant and the Commonwealth of Puerto Rico.

^ Claim No. 90365, also included in Exhibit A of Omnibus Objection No. 345 for erroneously classified claims

38	GONZALEZ LEON, IVETTE 372 PELLIN RODRIGUEZ VILLA PALMERA SANTURCE, PR 00915	05/08/18 17 BK 03566-LTS / Puerto Rico Government Employees' Retirement System	12526	\$59,313.00*	GONZALEZ DE LEON, IVETTE 372 PELLIN RODRIGUEZ VILLAS PALOMERAS SANTURCE, PR 00915	05/08/18 17 BK 03283-LTS/ The Commonwealth of Puerto Rico	12312^	\$59,313.00*
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Reason: Claim of duplicate debt, filed against the Puerto Rico Government Employees' Retirement System. All the invoked liabilities, if any, would be between the Claimant and the Commonwealth of Puerto Rico.

^ Claim No. 12312, also included in Exhibit A of Omnibus Objection No. 345 for erroneously classified claims

39	GONZALEZ VIVALDI, MIGDALIA R. 209 CALLE MANUEL F ROSSY SAN JUAN, PR 00918	07/21/18 17 BK 03566-LTS / Puerto Rico Government Employees' Retirement System	68525	\$20,000.00	GONZALEZ VIVALDI, MIGDALIA R 209 CALLE MANUEL F ROSSY SAN JUAN, PR 00918	07/21/18 17 BK 03283-LTS / The Commonwealth of Puerto Rico	68524	\$20,000.00*
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Reason: Claim of duplicate debt, filed against the Puerto Rico Government Employees' Retirement System. All the invoked liabilities, if any, would be between the Claimant and the Commonwealth of Puerto Rico.

*Specify which claim contains pending or undetermined amounts.

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SENTENCIA
KPE 2005-0608
PAGINA 19

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229. FIGUEROA CRUZ, IRIS M.	230. FIGUEROA GONZALEZ, ELIZABETH
231. FIGUEROA GONZALEZ, FLORENTINO	232. FIGUEROA FEREZ, AGUSTIN
233. FIGUEROA RAMOS, LOYDA:	234. FIGUEROA RODRIGUEZ, ANA M.
235. FIGUEROA ROSARIO, ANA L.	236. FIGUEROA SANTANA, JOSE C.
237. FIGUEROA TORRES, ROBERTO	238. FINES RIVERA, SAUL
239. FLORES GARCIA, FRANCISCO	240. FONTANET ALGARIN, AIDA X
241. FONTANEZ RIVERA, CARMEN S.	242. FORTY CARRASQUILLO, HEIDY X
243. FRANCO LOPEZ, ELBA M.	244. FREYTES O.EDA, OLGA I.
245. FUENTES BENITEZ, ANA M.	246. FUENTES CRUZ, INES
247. FUENTES MENDEZ, EDGARDO L	248. FUENTES SANTIAGO, MARIA DE LOS A. X
249. FUENTES VAZQUEZ, MELITZA	250. GARCES CASTILLO, EVA M.
251. GARCIA CANALES, CELIA	252. GARCIA DIAZ, ANA
253. GARCIA GARCIA, GLADYS E.	254. GARCIA MELENDEZ, GRISSEL M.
255. GARCIA MORALES, CINDY M.	256. GARCIA ORTIZ, CARMEN V.
257. GARCIA PUMAREJO, ORLANDO	258. GARCIA REYES, SANTOS J.
259. GARCIA RIVERA, GABRIEL	260. GARCIA ROMERO, CARMEN I.
261. GARCIA RULLAN, LETICIA	262. GARCIA VICENS, MARIA A.C.
263. GASCOT SAEZ, MARIA B.	264. GINES RIVERA, SONIA CRISTINA
265. GOMEZ CRUZ, RAFAEL	266. GOMEZ CHACON, GLORIA I.
267. GOMEZ HUERTAS, EVELYN	268. GOMEZ MALDONADO, MARIA MINERVA
269. GOMEZ OCASIQ, CARMEN E.	270. GOMEZ RIOS, LINDA VIRGINIA
271. GOMEZ TORRES, DOLORES	272. GOMEZ VAZQUEZ, LYDIA E.
273. GONZALEZ BENITEZ, ROSA M.	274. GONZALEZ COLLAZO, MARILU
275. GONZALEZ DE LEON, IVETTE X	276. GONZALEZ DIAZ, RUTH Z.
277. GONZALEZ ENCARNACION, LUZ D.	278. GONZALEZ FLORES, FELICITA
279. GONZALEZ GONZALEZ, NOELIA	280. GONZALEZ GONZALEZ, ROSA M.
281. GONZALEZ LARRAURY, GLADYS E.	282. GONZALEZ LUNA, LUIS A.
283. GONZALEZ MORALES, IRMA I.	284. GONZALEZ NIEVES, MAYRA
285. GONZALEZ ORTIZ, CARLOS	286. GONZALEZ OYOLA, CARMEN M.
287. GONZALEZ RIOS, RAMON	288. GONZALEZ RIVERA, RAMON A.
289. GONZALEZ ROSA, MIGDALIA	290. GONZALEZ VARGAS, CANDIDA:
291. GONZALEZ VAZQUEZ, CARMEN L.	292. GONZALEZ VAZQUEZ, LUCY E.
293. GRAULAU REYMUNDI, JOSE J.	294. GUTIEREZ GARCIA, LUZ EVELYN
295. GUTIERREZ RIVERA, CARMEN V.	296. GUTIERREZ TORRES, LUZ M.
297. GUZMAN GONZALEZ, LILLIAM	298. GUZMAN MCLINA, MARCELA
299. HENRRICY SANTIAGO, MARGARITA	300. HERNANDEZ CASTRO, MARIA B.
301. HERNANDEZ CEDENO, MARIA M.	302. HERNANDEZ DAVILA, LUZ N.
303. HERNANDEZ DE JESUS , RAMONA	304. HERNANDEZ HERNANDEZ, ANTONIO
305. HERNANDEZ HERNANDEZ, GLENDA I.	306. HERNANDEZ LOPEZ, ALVIN

November 9, 2012

María L. Torres Colón

Assistant Secretary of
Human Resources and
Labor Relations

RE: Nilda Agosto Maldonado
CIVIL Case No. KPE 2005-0608

I am writing to request an appeal in relation to the payment received on November 5, 2012, given that I do not agree with it.

In 1977, I began working for the Agency as a Social Services Technician I, after which, over the years, I attained the positions of TSF [Family Services Technician] II, TSF III, and then Social Worker I in 2001, and I was in service until I **retired** on September 30, 2012. It is fitting to mention that there are employees that began at the agency recently or have less time, and they received many more benefits.

I need you to review my file, given that I worked at the agency for 35 years and never received merit increases or any other type of increase.

In light of the above, I appeal because I am not in agreement with the amount received.

[Signature]

Ivette González de León

Social Worker I
Carolina I
(Mailing Address: Urb. Los Ángeles C/ Perseo # 39
Carolina, PR 00979)

**PROSOL
UTIER**

NOV 15, 2012

RECEIVED [Initials]

Cc: Atty. **Ivonne González Morales**

PO BOX 9021828
San Juan, PR 00902-1828

Milagros Acevedo Colón
Cond. Colina Real
2000 Ave. Felisa Rincón
Box 1405
San Juan, PR 00926

Manuel Díaz Lugo
PO Box 9020192
San Juan, PR 00902-0192

April 30, 2018

Commonwealth of Puerto Rico Claims Processing Center
C/O Prime Clerk Grand Central Station
PO Box 4708
New York, NY 10163-4708

**PROMESA Title III
Case No. 17BK 3283-LTS**

Dear Officials:

I, the undersigned, Ivette González De León, of legal age, U.S. citizen, currently retired from the Administration of Family and Children (ADFAN) of the Department of Family Affairs of the Commonwealth of Puerto Rico, hereby place on record that I am part of the claimants who are included as plaintiffs in the case of Nilda A. Agosto Maldonado vs. Commonwealth of Puerto Rico, Department of Family Affairs, et al. (Civil No. KPE 2005-0608) re Salary Claim.

I also place on record that, on September 16, 2010, Hon. Superior Court Judge Rebecca de León Ríos, ordered the employer to pay the salaries owed to the plaintiffs, and it was not until last November 2012 that we received a part payment of 25% of said salaries, as reported by the Department of Family Affairs. I, and all the plaintiffs, are unaware of the real amount of the debt, given that the Department of Family Affairs has never shown us any calculation or official document in this regard.

I submit the following in support of the above:

1. Copy of the judgment issued on September 16, 2010, by the San Juan Superior Court, ordering the payment of the salaries owed to the plaintiffs, with the exhibit which includes the list of the plaintiffs' names, where my name appears on page 19, under number 275.
2. Proof of the payment received of 25% of the debt shown in the document indicating the number of the check issued, amount of the payment received with the corresponding deductions applied.

It is important to point out that, once we are paid the outstanding payment, this will affect the amount of the pensions and social security we receive. In addition, it is necessary to calculate the applicable interest accrued on this money over the years, given that this is also owed to us.

I request that I be paid for the merit-based step increases for which I was recommended, but which were never granted, and vacation leave, per diem allowances, and any other debt pending payment.

Exhibit Page 5 of 7

For such purposes, I submit the claim documents, corresponding to the Schedule E and Schedule D – Case No. 17– BK–03283.

Although in relation to the Salary Claim, the litigating attorneys of the case received a notice of the Schedule H, and that they will fill it out and document it in order to send it, I am sending this letter and filling out the claims of the aforementioned Schedules, because I wish to continue as an active party in the PROMESA Act case and so that my claim be considered.

Yours sincerely,

[Signature]

Ivette González De León
Social Security No. XXX-XX-5148
Telephone: 321-557-5127.
C/Pillán Rodríguez 372
Villa Palmera, Santurce
San Juan, Puerto Rico 00915

Case:17-03283-LTS Doc#:17495-1 Filed:07/22/21 Entered:07/23/21 15:26:55 Desc:
Exhibit Page 6 of 7



***Office of the Assistant Secretary for
Human Resources and Labor Relations***

November 2, 2012

González De León, Ivette
Administration of Families and Children

Re: Nilda Agosto et al. KPE-2005-0608

Dear Colleague:

You are included as a plaintiff in the case of Nilda Agosto et al. vs. Department of Family Affairs, re Minimum Federal Wage.

Notwithstanding the above, and so as to begin reducing the debt, product of this claim from 2005, the Office of Management and Budget has identified some entries in the economy accounts of the Department of Family Affairs in order to credit the amount due to you in the claim in question. Attached to this letter, you will receive a check in the amount of \$19,771.04, equal to 25% of the total payment to which you are entitled in accordance with the stipulations of the judgment. Only Social security deductions and Contributions are being withheld from said payment.

We acknowledge that this advance payment does not represent the total payment, but rather, it is a good-faith partial payment, with the purpose of beginning to reduce the amount owed.

If you do not agree with the amount received, you have 10 days to file a claim before the Office of the Assistant Secretary of Human Resources and Labor Relations.

Sincerely,

[Signature]
María Luisa Torres Colón
Assistant Secretary

[stamp.]
**PROSOL
UTIER
NOV. 15, 2012
RECEIVED**

**Edificio Lila Mayoral, Ave. Barbosa 306
PO Box 11398, San Juan, PR 00910-1398 / Tel. (787) 294-4900 Ext. 2358/2359/ Fax (787) 765-1743**

COMMONWEALTH OF PUERTO RICO
TRIAL COURT
SUPERIOR COURT OF SAN JUAN

NILDA A. AGOSTO MALDONADO *ET AL.*
PLAINTIFF

V.

COMMONWEALTH OF PUERTO RICO, DEPARTMENT
OF FAMILY AFFAIRS *ET AL.*
DEFENDANT

CIVIL NO. KPE 2005-0808
(907)

RE:

DECLARATORY JUDGMENT;
AND SALARY CLAIM

JUDGMENT

The plaintiffs listed in the annex of this Judgment, which is incorporated herein by reference, forming an integral part hereof, are employees who hold positions with different classifications and they work or have worked at the Department of Family Affairs and its administrations: Secretariat, ADFAN [Administration of Family and Children], ADSEF [Administration of Socioeconomic Development of the Family], ASUME [Child Support Administration], and ACUDEN [Administration for Integral Child Care and Development].

The plaintiff employees filed the above-captioned action on February 23, 2005. They requested a Declaratory Judgment vacating General Memorandum 5-86, dated April 23, 1986, issued by the Central Office of Personnel Management, now the Office of Human Resources of the Commonwealth of Puerto Rico (ORHELA), given that it is contrary to the provisions established under the Uniform Compensation Act, Act No. 89 of July 12, 1979, 3 L.P.R.A § 760 *et seq.* (repealed) and contrary to the principal of equal pay for equal work, guaranteed by Art. II, section 16 of the Constitution of the Commonwealth of Puerto Rico.

The plaintiffs claim that their salaries were affected when the Department of Family Affairs implemented the federal minimum wage, which entered into effect on April 15, 1986, and subsequent increases, given that it rendered inoperative the existing salary structure and a different payment system was adopted, which is incompatible with the Uniform Compensation Act, *supra*. They argue that their right to receive compensation according to the functions they perform and the hierarchy, levels of responsibility, and complexity of their respective posts, in line with the value of their work within the job market, was violated.
[Signature]

De: Ivette González De León
Calle Pellin Rodríguez 372
Villa Palmeras Santurce, PR 00915

Case:17-03283-LTS Exhibits19 Page10 of 11 Entered:07/28/21 15:26:55 Desc:

Envelope , Page 1 of 1



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Tribunal de Distrito de los Estados Unidos (United States District Court)
Sala 150 Edificio Federal (Federal Building)
San Juan (Puerto Rico) 00918-1767

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U.S. DISTRICT COURT
10/13/2021 10:10 AM



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W TargemTranslations.com
E projects@targemtranslations.com
A 185 Clymer St. Brooklyn, NY 11211

TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)
TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 12526 DN 17495**

Signed this 20th day of December, 2021



Verify at www.atanet.org/verify

A handwritten signature in blue ink that appears to read "Andreea I. Boscor".

Andreea I. Boscor

